

Federal Communication Commission  
Washington, DC  
March 26, 2004

In Re: RM-10867

The ARRL proposal to upgrade existing Technician and "Technician Plus" to General class operators without passing the General theory element 3 examination makes no sense at all. Even more so since they propose making Element 3 the theory examination for future General class upgrades from the new Entry Level class.

So existing Generals took #3, upgrading Entry Levels going on to Generals will be required to take #3, but the current Technician group wouldn't - and will get upgraded without any examination? And the ARRL argument that the Technician and General theory exam is basically the same - and therefore redundant- is absurd. I'm convinced the FCC would not have allowed the same examination to serve two classes of license. Although similar topics may be covered in more depth and detail , it is not duplicative.

While everyone is in support of "opening the HF phone door a crack" to give entering amateurs a taste and motivation for more, we must guard against creating a Senior Citizen's Band by advancing the huge group of Technician class operators who have not - and will not - put forth the effort to gain the additional knowledge and skills to progress in license class.

You can accomplish the same end, and not risk the dumbing down potential, by allowing upgrade to General without the code element, but keeping in place the theory element. I can understand, and endorse, the elimination of code for the General class, but not additional theory and operating practice exams.

The Advanced to Extra upgrade makes sense as the time in class at that level of performance makes for good seasoning.

The public, and the amateur community, is trusting the FCC to add some sanity and objectivity to this necessary restructuring. This proposal appears to many of us as a Grand Membership drive by the ARRL.

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